

REMARKS

Favorable reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks are respectfully requested.

In the latest Office Action, claim 11 was indicated as being allowable. In the amendment filed previously, however, claim 11 was canceled and new claim 45 was added. Examiner Rinehart in a subsequent telephone communication indicated that claim 45 was in condition for allowance.

In the Office Action, claims 10, 12, 22 and 26 continue to stand objected to under 35 U.S.C. §112. Although Applicants do not acquiesce in the rejection, claim 12 has been canceled and claims 10, 22 and 26 have been amended in order to render the rejection moot.

In addition to independent claim 45, independent claims 1, 15 and 28 are pending. In the Office Action, the claims were rejected under 35 U.S.C. §103 over Huostila in view of Kankaanpaa. The Examiner indicated that Applicants' previous arguments were not persuasive since Applicants were attempting to "show nonobviousness by attacking references individually where the rejections are based on combinations of references".

Reconsideration is respectfully requested. In Applicants' previous response, Applicants were not "arguing against the references individually". Instead, Applicants submit that it would not have been obvious to combine the references as proposed in the Office Action.

More specifically, the Office Action alleges that it would have been obvious to replace the roller 25 in Huostila with the transfer roll as shown in Kankaanpaa. Huostila, however, teaches away from being combined with Kankaanpaa as asserted in the Office Action. In fact, replacing the roller 25 in Huostila with the transfer roll in Kankaanpaa destroys the function of the roller 25 in Huostila.

For instance, as stated in Applicants' previous response, independent claims 1, 15 and 28 all define a transfer roll that includes a pressurized zone configured to emit a gaseous stream or fluid that facilitates the transfer of a paper web. Directly opposite to Applicants' claims, Huostila teaches the use of a roller 25 that is equipped with a vacuum zone as opposed to emitting a gaseous or fluid stream. The vacuum zone in the roller 25 in Huostila creates a suction zone for dewatering the web and dewatering the felt.

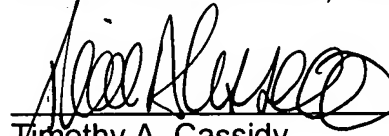
Kankaanpaa, on the other hand, does disclose a transfer roll 19 that includes an overpressure chamber 20. Replacing the suction roller 25 in Huostila with the roller 19 in Kankaanpaa, however, completely destroys the function of the vacuum roller as taught in Huostila. For instance, Huostila teaches using a vacuum roller or drawing roller in order to dewater the web and to remove water from the felt. Replacing the vacuum roller with the roller having a pressurized zone in Kankaanpaa would actually cause water to transfer from the felt back into the web W. As such, Applicants submit that it would not have been obvious to modify Huostila with Kankaanpaa as asserted in the Office Action. Thus, claims 1, 15 and 28 patentably define over the combination.

In addition, the Examiner's attention is also directed to claims 1 and 15 which require that the transfer roll be positioned outside the endless loop of the throughdrying fabric. In Huostila, on the other hand, the vacuum roll 25 is positioned inside the endless loop of the fabric. Thus, even if there was some way in which the vacuum roller in Huostila could be replaced with the pressurized roller in Kankaanpaa, at least one element of claims 1 and 15 would still remain absent from the combination.

In summary, Applicants submit that the present application is in complete condition for allowance. At the very least, Applicants request that the above amendments be entered into the record so as to simplify issues on appeal. Should Examiner Rinehart have any questions regarding this Response, he is invited and encouraged to telephone the undersigned at his convenience.

Respectfully submitted,

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